

1 ETHAN A. BALOGH, No. 172224
2 BALOGH & Co., APC
3 100 Pine Street, Suite 1250
4 San Francisco, CA 94111
5 Telephone: 415.391.0440
6 Facsimile: 415.373.3901
7 eab@balcolaw.com

8 Attorneys for Defendant
9 JINNIE CHAO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JINNIE CHAO,

17 Defendant.

Case No. 16 Cr. 435 EJD

DEFENDANT JINNIE CHAO'S STATUS
CONFERENCE STATEMENT

Before the Honorable Nathanael Cousins
United States Magistrate Judge

1 Defendant Jinnie Chao, by and through her counsel, respectfully provides the following
 2 status as directed by this Court. (Ms. Chao informed the prosecutors he would provide edits on
 3 their proposed statement, but they filed their own version instead.)
 4

5 Since the parties appeared before the Court on December 22, 2021, (1) the Government
 6 produced the December 6 transcript; (2) the parties' submitted competing protective orders, with
 7 objections to the others'; and (3) the Court's issued the Protective Order earlier today, January 4,
 8 2022.

9 Ms. Chao has informed the United States that he possesses and will produce presently
 10 materials from one of Defendant's three healthcare providers. (Ms. Chao previously advised he
 11 would make this production shortly after the issuance of protective order, which issued today.)
 12 This production will cover the issues related to the current issue of trial continuance based on
 13 Ms. Chao's serial surgeries arising from her breast cancer. Ms. Chao further informed the
 14 Government that she is waiting for further productions (as well as updates on those productions)
 15 concerning historical treatment; those records do not bear on the request for a trial continuance.
 16 Ms. Chao also noted that her counsel has been sick and on bed rest since January 2, and this
 17 circumstance has affected significantly his ability to advance the issues this week. (Like
 18 government counsel, Ms. Chao's counsel took last week as a holiday week.)

19 Last, the Government informed Ms. Chao today as follows: "The United States
 20 continues to respectfully request issuance of the Rule 17 subpoenas to Defendant's healthcare
 21 providers to ensure that the parties and the Court have the necessary information to effectively
 22 prepare for the January 31, 2022 hearing on Defendant's motion to continue her trial." Ms. Chao
 23 contends that is statement proves that the material it seeks are not permissible under Rule 17.

24 Respectfully submitted,

25 DATED: January 4, 2022

26 /s/ E A Balogh
 27 ETHAN A. BALOGH
 28 Attorneys for Defendant
 JINNIE CHAO